

East Northamptonshire Local Plan Part 2 Examination

Matter 5 – Housing Allocations in Rushden and Higham Ferrers

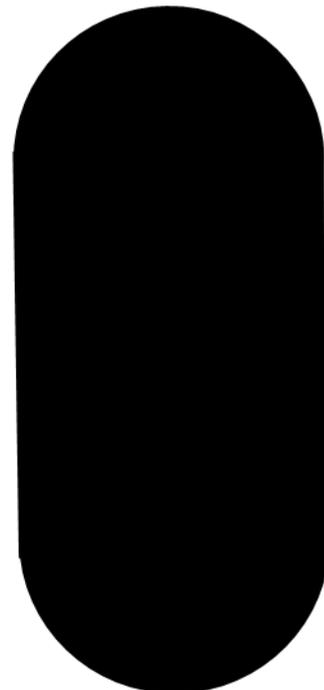
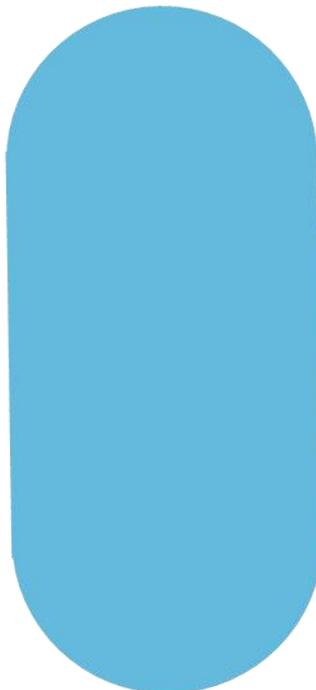
Issue - Whether the following housing allocations are soundly based, justified and deliverable

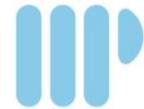
EN28 Land east of the A6/Bedford Road, Rushden (450 dwellings)

Hearing Statement

Bellway Homes Limited

Respondent ID: R19/026





This Hearing Statement is submitted on behalf of Bellway Homes Limited who control the majority of land east of the A6/Rushden (Policy EN28), and supports representations submitted to the Pre-Submission Draft Local Plan Part 2 Consultation, February 2021.

1) Are the housing allocations appropriate and justified in light of the potential constraints, infrastructure requirements and adverse impacts?

1.1. Yes, Policy EN28 is appropriate and justified as evidenced in the background papers, Infrastructure Delivery Plan, and Sustainability Appraisal (SA). The SA identifies potential constraints, and adverse impacts.

1.2. In relation to Accessibility, the A6 bypass is identified as an obstacle to safe pedestrian movement (para 9.2.26). However, this is addressed within the Policy which requires maximising opportunities to improve connectivity to, and enhance the quality of, the public rights of way network. The Vision Document and Transport Appraisal submitted by Bellway Homes Limited with its representations illustrates how improvements could be made to promote sustainable transport and provide a genuine choice of transport modes in accordance with section 9 of the Framework. These include provision of a safe, signalised toucan crossing of the A6 connecting to the existing footway/cycleway, and a pedestrian link north to the Newton Road and the Rushden East SUE.

1.3. In relation to Health and Liveability, the SA recognises the potential for impacts from the adjacent A6 (para 9.4.12). However, this is addressed within the Policy which requires suitable features along the western boundary to provide the necessary mitigation for noise and air pollution arising from the A6 Bypass. The Vision Document submitted by Bellway Homes Limited with its representations illustrates how such mitigation could be provided without undermining the delivery of the proposed allocation of 450 homes, in accordance with section 15 of the Framework.

1.4. In relation to Biodiversity, the site is 3.3km to 4km away from the Upper Nene Valley Gravel Pits SPA (para 9.9.16) and therefore outside of the 3km buffer zone. The Policy requires appropriate mitigation measures to avoid significant adverse impacts upon the integrity of the designation. The Vision Document and



Ecological Statement submitted by Bellway Homes Limited with its representations illustrates such mitigation would be provided in the form of green infrastructure and open space on site to provide alternative natural greenspace in accordance with section 15 of the Framework. Natural England have confirmed in their representations they are supportive of this approach.

- 1.5. Natural England have also supported further Wintering Birds Survey to ascertain whether the land parcel supports a significant proportion of the SPA population. These surveys (including nocturnal surveys) have been undertaken in 2020/21 (reported in the Ecological Statement), and 2021/22 (to be reported within the planning application). No SPA species were recorded.
- 1.6. In relation to Landscape, the SA notes the site is relatively well contained and visual impacts are likely to be low (para 9.10.13). Further, impacts are likely to be minimised as the Policy requires a design-led masterplan for the site with appropriate multi-functional structural landscaping. The Vision Document and Supporting Landscape Statement submitted by Bellway Homes Limited with its representations illustrates how such impacts can be mitigated through the provision of structural landscaping and areas of open space.
- 1.7. In relation to Natural Hazards and flooding, the SA notes the urbanisation of the site could increase the rate of surface water run-off (para 9.15.11). However, this is addressed within the Policy which requires sustainable drainage systems (SuDS). The Vision Document and Supporting Letter on Flooding and Drainage submitted by Bellway Homes Limited with its representations illustrates how SuDS could be provided, in accordance with section 14 of the Framework.
- 1.8. Finally, in relation to Soil and Land, there will be a permanent loss of agricultural land (para 9.16.12). However, large parts of the District are of the same quality and the loss of agricultural land is not a strong reason for restricting the distribution of development and is not an area or asset of particular importance (para 11b) i. of the Framework).
- 1.9. It is noted that no objections are raised to the proposed allocation by statutory consultees. One objection is raised by a party promoting an Omission Site. They



reference key issues in relation to highways, and poor connectivity and accessibility. These are matters addressed within the Transport Appraisal submitted with the representations.

1.10. There are therefore no constraints or infrastructure requirements that cannot be overcome through careful masterplanning and financial contributions secured through a Section 106 Agreement. Further, adverse impacts do not significantly or demonstrably outweigh the benefits when assessed against the policies of the Framework as a whole.

2) Are there any significant factors that indicate that any sites/parts of sites should not have been allocated?

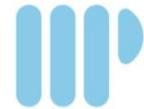
1.11. No

3) Are the sites viable and deliverable? Is there any risk that site conditions and constraints might prevent development or adversely affect viability and delivery?

1.12. Yes, Bellway Homes Limited control the land and are confident they can deliver a viable development. There are no known site conditions or constraints that would undermine the viability or delivery of the development.

4) How were the site capacities determined? What assumptions have been made? Are these justified?

1.13. Bellway Homes Limited submitted a Vision Document with their representations which included a Concept Masterplan. This illustrates how a development of 450 homes could be accommodated at a density of 35 dwellings per hectare across a developable area of 12.85ha. The assumptions made within this Concept Masterplan are justified and explained within the Document.



5) What is the current planning status of the site?

1.14. An outline planning application with all matters reserved save for access has been prepared, and will be submitted to the Council in April 2022. The application will seek outline planning permission for up to 450 dwellings and community/retail/health facility in accordance with the proposed allocation.

6) What benefits would the proposed development bring?

1.15. Aside from the delivery of market housing to meet an identified need within the JCS to 2031, there will be affordable housing, and specialist and older persons housing to meet identified local needs. The delivery of housing has associated economic benefits through the construction period, and through the provision of housing to support the economic growth of the town.

1.16. The land to the immediate east of the proposed allocation is the subject of a planning application by the Town Council for the erection of a new rugby club and four playing pitches. The proposed development will better connect the proposed facility with the town; providing a safer environment for visitors accessing the club from the A6, and better natural surveillance of the club improving its security and safety.

1.17. The provision of open space and play areas (some 10ha) will complement the proposed facilities at the rugby club, and improve the amenity of the area for future residents and visitors. The potential footpath link to the north provides new opportunities for recreation for new and existing residents.

1.18. The provision of a community/retail/health facility will have economic benefits through job creation, and social benefits for existing and future residents.



7) What are the potential adverse impacts of developing the site and how might they be mitigated?

1.19. There are potential adverse impacts on landscape, ecology, and highways. However, these can all be mitigated through careful masterplanning, green infrastructure, and investment in sustainable transport and highway infrastructure.

8) Would the Modifications proposed by the Council address any shortcomings?

1.20. Yes, as set out in the Positional Statement, the proposed modifications address the shortcomings identified within Bellway Homes Limited's representations.

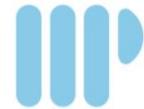
9) What is the expected timescale and rate of development and is it realistic?

1.21. Bellway Homes Limited have agreed a Positional Statement with the Council (EXAM-15) in respect of land east of the A6/Rushden. This includes a trajectory at page 11 anticipating delivery of an average of 50-60 dwellings per annum from 2023/24 (with 30 dwellings in 2023/24). This trajectory is considered reasonable and justified based on the evidence set out below.

1.22. An outline planning application with all matters reserved save for access has been prepared, and will be submitted to the Council in April 2022. The application will seek outline planning permission for up to 450 dwellings and community/retail/health facility in accordance with the proposed allocation.

1.23. The assessments that underpin the application do not indicate any matters that might unduly delay determination of the application. All effects can be adequately mitigated and secured by way of condition or obligation.

1.24. The illustrative masterplan that supports the quantum of development proposed has regard to all constraints, and has been informed by pre-application discussions with the Council and public consultation.



- 1.25. Determination of the application is envisaged in autumn 2022 allowing time for completion of the S106 Agreement. First phase of reserved matters and pre-commencement condition applications will be prepared and submitted in early 2023. Determination of these applications is envisaged in summer 2023, allowing for commencement of development thereafter and first completions in 2023/24.
- 1.26. It will be noted that development will be served by an existing access that only needs to be upgraded. There is not therefore significant highway works required to open the site up for construction.
- 1.27. It is noted representations have been made claiming the deliverability will be complicated by the functional relationship the site has with the Rushden East SUE, particularly with regards to highways. Reference is made to there being no certainty as to the impact on both the local and strategic highway network. This representation has only been explained with reference to highways, and therefore it is assumed this is the only element which is of concern to the objector.
- 1.28. In response, firstly, there have been no objections to Policy EN28 from relevant highway consultees, including National Highways. Criteria c) of Policy EN28 requires the proposals to be informed by a transport assessment, and a cumulative assessment of the impact on the highway network of Policy EN28 and Rushden East SUE has been undertaken, and will be submitted to the Council as part of the planning application in April.
- 1.29. Bellway Homes Limited and their appointed transport consultants have worked closely with the Local Highway Authority and their consultants in undertaking this assessment. Mitigation of impacts at specific junctions will be required, and these have been designed and are deliverable, and will be secured by way of condition or Section 106 Agreement through the Development Management process. The apportionment of costs or works between the two developments will be addressed through this process, but there is nothing unique or difficult in planning applications for two major sites coming forward together for determination at the same time. It is not therefore accepted delivery will be complicated by the functional relationship with Rushden East SUE, and Bellway Homes Limited have no interest in the SUE.



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- 1.30. Representations made by the same objector also raise concerns as to saturation in Rushden within the housing market. In response, it is noted there have been no objections to Policy EN28 from the promoters of Rushden East SUE or any other site developers within the town. One can assume therefore they are not concerned the market will be saturated by the inclusion of this site.
- 1.31. The Council's proposed trajectories for Rushden East SUE and Policy EN28 see completion rates at around the 200 units per annum level. This level of completions at a town the size of Rushden is not unrealistic.
- 10) Is the boundary of the site appropriate? Is there any justification for amending the boundary?**
- 1.32. Yes, the boundary is appropriate.
- 11) Are the detailed policy requirements for each site, effective, justified and consistent with national policy? Are they needed when some of the sites already have planning permission?**
- 1.33. Yes, the detailed policy requirements are considered effective, justified, and consistent with national policy.

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